1 2 3 4 5 6	DENNIS J. HERRERA, State Bar #139669 City Attorney ELIZABETH SALVESON, State Bar #83788 Chief Labor Attorney JONATHAN C. ROLNICK, State Bar #151814 Deputy City Attorney Fox Plaza 1390 Market Street, Floor #5 San Francisco, California 94102-5408 Telephone: (415) 554-3815 Facsimile: (415) 554-4248	
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8 9	Attorneys for Defendants CITY AND COUNTY OF SAN FRANCISCO and WILLIAM FRAZIER	
10	IN THE UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12	SUSIE ABRAM,	Case No. C07-3006 PJH
13	Plaintiff,	E-filing case
14	VS.	STIPULATION AND [PROPOSED]
15 1		ORDER CONTINUING EXPERT
15 16 17 18	CITY AND COUNTY OF SAN FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL	ORDER CONTINUING EXPERT DISCOVERY CUTOFF Trial Date: December 8, 2008
16 17	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA	DISCOVERY CUTOFF
16 17 18	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL	DISCOVERY CUTOFF
16 17 18 19	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL	DISCOVERY CUTOFF Trial Date: December 8, 2008
16 17 18 19 20	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL Defendant. IT IS HEREBY STIPULATED by and by	DISCOVERY CUTOFF Trial Date: December 8, 2008
16 17 18 19 20 21	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL Defendant. IT IS HEREBY STIPULATED by and by	DISCOVERY CUTOFF Trial Date: December 8, 2008 Detween the parties: Oos. Under the Court's scheduling order expert
16 17 18 19 20 21 22	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL Defendant. IT IS HEREBY STIPULATED by and by This case is set for trial on December 8, 20	DISCOVERY CUTOFF Trial Date: December 8, 2008 Detween the parties: Oos. Under the Court's scheduling order expert Plaintiff Susie Abram has identified one expert
16 17 18 19 20 21 22 23	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL Defendant. IT IS HEREBY STIPULATED by and by This case is set for trial on December 8, 20 discovery closes on Friday, September 5, 2008. Fe witness, Dr. Jeanne Riviore. The City has timely	DISCOVERY CUTOFF Trial Date: December 8, 2008 Detween the parties: Oos. Under the Court's scheduling order expert Plaintiff Susie Abram has identified one expert
16 17 18 19 20 21 22 23 24	FRANCISCO, DEPARTMENT OF PUBLIC HEALTH; WILLIAM FRAZIER, DIRECTOR OF THERAPEUTIC ACTIVITIES, LAGUNA HONDA HOSPITAL Defendant. IT IS HEREBY STIPULATED by and by This case is set for trial on December 8, 20 discovery closes on Friday, September 5, 2008. Fe witness, Dr. Jeanne Riviore. The City has timely The Court heard the City's motion for sum	DISCOVERY CUTOFF Trial Date: December 8, 2008 Detween the parties: Dos. Under the Court's scheduling order expert Plaintiff Susie Abram has identified one expert sought to depose Dr. Riviore.

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1	further time and expense, the parties agree to extend the expert discovery cutoff from September 5	
2	2008 to October 10, 2008, and to request that the Court enter an order to that effect. The parties do	
3	not anticipate that this will have any adverse impact on their ability to prepare for the November 13	
4	2008 pretrial conference or the December 8, 2008 trial date.	
5	Dated: September 2, 2008	
6	DENNIS J. HERRERA City Attorney	
7	ELIZABETH SALVESON Chief Labor Attorney	
8	JONATHAN C. ROLNICK Deputy City Attorney	
9		
10	By: s:/Jonathan C. Rolnick JONATHAN C. ROLNICK	
11		
12	Attorneys for Defendants CITY AND COUNTY OF SAN FRANCISCO	
13	and WILLIAM FRAZIER	
14	Dated: September 2, 2008	
15	LAW OFFICES OF CURTIS G. OLER	
16		
17	By: s:/Curis G. Oler CURTIS G. OLER	
18	Attorneys for Plaintiff	
19	SUSIE ABRAM	
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[PROPOSED] ORDER

IT IS HEREBY ORDERED THAT the September 5, 2008 discovery cutoff be continued to

October 10, 2008.

DATED: __9/5/08 _____

